



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



August 27, 2009

Jon Sanabria
Acting Director of Planning

TO: Supervisor Don Knabe, Chair
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Michael D. Antonovich

FROM: Jon Sanabria
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SUBJECT: **RESPONSE TO BOARD MOTION REGARDING COORDINATION OF
THE GENERAL PLAN UPDATE AND EIR WITH OTHER COUNTY
CLIMATE CHANGE INITIATIVES (MAY 12, 2009, ITEM #2)**

On May 12, 2009, the Board instructed the Acting Director of Regional Planning in consultation with the Acting County Counsel and other appropriate Departments to report back on how the Department of Regional Planning (DRP) will develop the General Plan and its companion EIR in a way that will:

- a) inventory the County's operational and communitywide contribution to greenhouse gas emissions in accordance with accepted protocols;
- b) help to ensure that the County is prepared to adapt to the likely environmental effects of climate change through a combination of policies contained within the General Plan itself, the enumeration of future implementation actions, and/or coordination with the Climate Action Plan; and
- c) ensure that the current draft of the General Plan will be modified in response to any new data and policy recommendations that emerge from the plan's Environmental Impact Report (EIR), the greenhouse gas emissions inventory, and the climate change adaptation modeling and the Climate Action Plan in a way that will create the clear and measurable, and enforceable package of environmental measures, policies, and future implementation actions necessary to reduce communitywide greenhouse gas emissions in compliance with Board policy, AB 32 Scoping Plan benchmarks, and CEQA mandates.

On June 30, 2009, the staff reported back to the Board on how the draft General Plan and EIR address climate change, and the Department's intent to make revisions to the draft to strengthen existing climate change provisions, and to add additional policies and programs, as needed. Furthermore, the staff provided a detailed description of the requisite climate change analyses that the EIR will include, as well as how it will address potential concerns raised by the Attorney General.

The staff also committed to meeting with the Chief Executive Office (CEO), Board offices and County Counsel, and reporting back in 60 days on a timeline and work plan for the General Plan Update and EIR.

Next Steps for the General Plan Update

On August 10, 2009, the CEO convened a meeting with the Board planning deputies, and staff from DRP, Internal Services Department (ISD), Department of Public Works (DPW), Community Development Commission (CDC) and County Counsel to: identify opportunities to coordinate concurrent efforts to address climate change and implement the objectives of AB 32; reach a consensus decision on whether the County should proceed with the EIR for the General Plan Update; and reach a consensus decision on whether the County should ask the Southern California Association of Governments (SCAG) to consider the County unincorporated areas as a subregion for the purposes of SB 375.

After the staff from various Departments explained their role in responding to AB 32 and SB 375, the DRP staff led a discussion on different options for moving forward with the General Plan Update and EIR, as well as the Department's recommended approach to SB 375.

The following issues were raised:

General Plan Update

- There needs to be a fundamental redesign of the General Plan before the EIR can be completed.
- There is concern over communities having to deal with "plan overload."
- There are differences among the five Supervisorial Districts. Some support Transit Oriented Districts (TOD), affordable housing, higher density housing, parking reductions, and policies that curb sprawl. Limiting greenfield development is a major component of planning to address climate change.
- Plans should be prepared with programmatic EIRs so that development can occur by-right in targeted areas.
- Some are not sold on the investment that DRP has put into the General Plan Update.
- There is concern and confusion over GHG reduction targets for the General Plan, as well as confusion over the responsibility to meet those targets.

- There are multiple models, related to GHG emissions, to determine what is considered a significant impact through CEQA. There is currently no consistent approach.
- DRP has a consultant to prepare the EIR for the General Plan Update. If the direction is to significantly delay the preparation of the EIR, then formal Board action would be required. Also noted was the possibility that the EIR consultant may not be willing to postpone the contract for years.
- The timeline of the General Plan Update impacts other planning programs and contracts, such as the Zoning Ordinance Update Program (ZOUN).
- There is a general dissatisfaction with the current draft of the General Plan, and this warrants putting the preparation of the EIR on hold until changes can be made to the draft.

SB 375

- Based on the County's prior experience with the RHNA, obtaining status as a subregion would simplify negotiations around SB 375.
- Any discussions or negotiations over GHG emission reduction targets should be done by section head-level staff.
- Regardless of subregional status, it is important to work toward meaningful collaboration with other subregions in LA County.

The group reached consensus on putting the preparation of the General Plan EIR on hold for the next six months in order to make major changes, including policy-driven land use changes, to the draft General Plan. In addition, the group reached consensus on the County's intent to respond to SB 375 by preparing a Sustainable Communities Strategy (SCS) for the unincorporated areas, and actively participating in other subregional SCS efforts. Furthermore, the DRP staff committed to working closely with the Board offices over the next six months on the changes to the draft General Plan, and with other Departments to ensure that the General Plan Update, the implementation of SB 375, County's Climate Action Plan and other related efforts inform one another.

Should you have any questions regarding this memo, please contact Connie Chung in the Housing/General Plan Section at (213) 974-6417 or cchung@planning.lacounty.gov.

JS:RCH:CC

c: Chief Executive Officer (Attn. Lari Sheehan)
 Acting County Counsel
 Executive Officer, Board of Supervisors
 Community Development Commission
 Department of Public Works
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